

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,

Plaintiff,

v.

NADINE J. GRIFFIN,

Defendant.

26 U.S.C. § 7206(1)  
(Filing False Income Tax Returns)

CR-05-10175-WG-Y

## INDICTMENT

### The Grand Jury Charges:

## INTRODUCTORY ALLEGATIONS

At all times relevant to this Indictment:

1. The defendant, NADINE J. GRIFFIN, is a United States Citizen and was a resident of Danvers, Massachusetts.
2. From in or about 1996 through at least 1999, defendant NADINE J. GRIFFIN was a salesperson for Global Prosperity.
3. Global Prosperity was an organization founded in 1996, which was in the business of selling a 12-part audiotape/compact disc series, as well as tickets to offshore seminars located in such places as Aruba and Cancun, Mexico. Global Prosperity was known by various names including Global Prosperity Marketing Group, the Global Prosperity Group, and the Institute of Global Prosperity (hereinafter referred to as "Global Prosperity").
4. As a salesperson for Global Prosperity, Nadine J. Griffin sold the following goods and services:

- a. Global 1 (G1): a 12-part audiotope/compact disc series retail priced at \$1,250 per series.
  - b. Global 2 (G2): a seminar ticket to a three-day offshore seminar retail priced at \$6,250 per ticket.
  - c. Global 3 (G3): a seminar ticket to a five-day offshore seminar retail priced at \$18,750 per ticket.
5. Global Prosperity primarily marketed and sold its products through a network of distributors or salespersons modeled after the multi-level marketing design.

The Grand Jury further charges:

COUNT 1  
26 U.S.C. § 7206(1)  
(Filing False Income Tax Returns)

6. On or about July 30, 1999, in the District of Massachusetts, defendant NADINE J. GRIFFIN, who was a resident of Danvers, Massachusetts, did willfully make and subscribe a 1998 U.S. Individual Income Tax Return, Form 1040, for the calendar year 1998, which was verified by a written declaration that it was made under the penalties of perjury and which was filed with the Internal Revenue Service, and which said income tax return defendant NADINE J. GRIFFIN did not believe to be true and correct as to every material matter in that the said 1998 income tax return reported Schedule C gross receipts of \$31,348.01, whereas, defendant NADINE J. GRIFFIN then and there well knew and believed, that defendant failed and omitted to disclose on the said 1998 income tax return and attached Schedule C, or any other Schedule C, or otherwise, a substantial amount of gross receipts from her business activity as a salesperson for Global Prosperity.

All in violation of Title 26, United States Code, Section 7206(1).

The Grand Jury further charges:

COUNT 2  
26 U.S.C. § 7206(1)  
(Filing False Income Tax Returns)

7. On or about April 12, 2000, in the District of Massachusetts, the defendant NADINE J. GRIFFIN, who was a resident of Danvers, Massachusetts, did willfully make and subscribe a 1999 U.S. Individual Income Tax Return, Form 1040, for calendar year 1999, which was verified by a written declaration that it was made under the penalties of perjury and which was filed with the Internal Revenue Service, and which said income tax return defendant NADINE J. GRIFFIN did not believe to be true and correct as to every material matter in that the said 1999 income tax return reported Schedule C gross receipts of \$30,127.00, whereas, defendant NADINE J. GRIFFIN then and there well knew and believed, that defendant failed and omitted to disclose on the said 1999 income tax return and attached Schedule C, or any other Schedule C, or otherwise, a substantial amount of gross receipts from her business activity as a salesperson for Global Prosperity.

All in violation of Title 26, United States Code, Section 7206(1).

A TRUE BILL

  
FOREPERSON OF THE GRAND JURY

  
CHRISTOPHER MAIETTA  
ASSISTANT U.S. ATTORNEY */True Atty, DOJ Hon. D.*

DISTRICT OF MASSACHUSETTS; July <sup>13 (BL)</sup> 12, 2005.

Returned into the District Court by the Grand Jurors and filed.

  
DEPUTY CLERK

12:49 P

JS 45 (5/97) - (Revised USAO MA 6/29/04)

**Criminal Case Cover Sheet****U.S. District Court - District of Massachusetts**Place of Offense: District of Mass. Category No. II Investigating Agency IRS/CICity Boston Related Case Information:County Suffolk Superseding Ind./ Inf. \_\_\_\_\_ Case No. \_\_\_\_\_  
Same Defendant \_\_\_\_\_ New Defendant \_\_\_\_\_  
Magistrate Judge Case Number \_\_\_\_\_  
Search Warrant Case Number \_\_\_\_\_  
R 20/R 40 from District of \_\_\_\_\_**Defendant Information:**Defendant Name Nadine J. Griffin Juvenile ☐ Yes ☒ No

Alias Name \_\_\_\_\_

Address Seminole, FLBirth date (Year only): 1960 SSN (last 4 #): 2839 Sex F Race: Caucasian Nationality: U.S. CitizenDefense Counsel if known: James Krasnoo Address: 23 Main Street, Terrace Level  
Andover, Mass.



Bar Number: \_\_\_\_\_

**U.S. Attorney Information:**AUSA Christopher J. Maietta Bar Number if applicable N/AInterpreter: ☐ Yes ☒ No List language and/or dialect: \_\_\_\_\_Matter to be SEALED: ☐ Yes ☒ No☐ Warrant Requested☒ Regular Process☐ In Custody**Location Status:**

Arrest Date: \_\_\_\_\_

☐ Already in Federal Custody as \_\_\_\_\_ in \_\_\_\_\_☐ Already in State Custody \_\_\_\_\_ ☐ Serving Sentence ☐ Awaiting Trial☐ On Pretrial Release: Ordered by \_\_\_\_\_ on \_\_\_\_\_Charging Document: ☐ Complaint ☐ Information ☒ IndictmentTotal # of Counts: ☐ Petty \_\_\_\_\_ ☐ Misdemeanor \_\_\_\_\_ ☒ Felony \_\_\_\_\_

Continue on Page 2 for Entry of U.S.C. Citations

 I hereby certify that the case numbers of any prior proceedings before a Magistrate Judge are accurately set forth above.Date: 7/13/05Signature of AUSA: 

JS 45 (5/97) - (Revised USAO MA 3/25/02) Page 2 of 2 or Reverse

District Court Case Number (To be filled in by deputy clerk): \_\_\_\_\_

Name of Defendant Nedie J. Griffin

## U.S.C. Citations

	<u>Index Key/Code</u>	<u>Description of Offense Charged</u>	<u>Count Numbers</u>
Set 1	<u>26 USC 7206(1)</u>	<u>USE. Filing False Tax Returns</u>	<u>1</u>
Set 2	<u>26 USC 7206(1)</u>	<u>Filing False Tax Returns</u>	<u>2</u>
Set 3	_____	_____	_____
Set 4	_____	_____	_____
Set 5	_____	_____	_____
Set 6	_____	_____	_____
Set 7	_____	_____	_____
Set 8	_____	_____	_____
Set 9	_____	_____	_____
Set 10	_____	_____	_____
Set 11	_____	_____	_____
Set 12	_____	_____	_____
Set 13	_____	_____	_____
Set 14	_____	_____	_____
Set 15	_____	_____	_____

ADDITIONAL INFORMATION: